

REMARKS/ARGUMENTS

In view of both the amendments presented above and the following discussion, the Applicants submit that none of the claims now pending in the application are indefinite under 35 USC § 112, non-statutory under 35 USC § 101, anticipated under the provisions of 35 USC § 102 (e) or obvious under the provisions of 35 USC § 103 (a). Thus, the Applicants believe that all of these claims are now in allowable form.

If, however, the Examiner believes that there are any unresolved issues resulting in adverse action in any of the claims now pending in the application, Applicants request that the Examiner telephone Ms. Janet M. Skafar, Esq. at message telephone number (650) 988-0655 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

APPLICANTS SUMMARY OF INTERVIEW OF MARCH 19, 2007

Applicants thank Primary Examiner Abel Jalil and Examiner Johnson for the Examiners Interview on March 19, 2007. Applicants thank the Examiners for clarifying the 101 Rejection of Claims 1, 14, 24 and 34, the 102 Rejection of Claims 1 and 9 with respect to the Owen reference, the 103 Rejection of Claims 17 and 23 with respect to the Ghoneimy reference, the 103 rejection of Claims 30 and 31 with respect to the Brunner reference, and the 102/103 Rejections of Claims 34, 39 and 43 with respect to the Zintel and Armstrong reference.

The Examiner also pointed out: an antecedent problem in Claim 2 with respect to the term "the creation"; the use of the word "for" in Claims 1, 14 and 34; with respect to Claim 10 to change "can be" to "is"; that Claim 24 has no preamble; that Claim 32 recites "can"; and with respect to Claim 35 the term "stored state".

Docket No.: SVL920040562US2
Appl. No.: 10/825,622
Amdt. dated March 21, 2007
Response to Office Action of November 21, 2006

STATEMENT CONCERNING COMMON OWNERSHIP

APPLICATION 10/825,622 AND APPLICATION 09/824,694 WERE,
AT THE TIME THE INVENTION OF APPLICATION 10/825,622 WAS MADE,
OWNED BY, OR SUBJECT TO AN OBLIGATION OF ASSIGNMENT TO,
VENETICA CORPORATION.

Status of Claims

Claims 1-22, 24-27, 29-32, 34-46, and 47-51 are pending in this application. Claims 1-3, 5, 7-14, 16-18, 24, 26-27, 29-32 and 34, 35, 37-46 are amended. Claims 23, 28 and 33 are canceled. Claims 47-51 are new.

Amendments to the Specification

The specification is being amended to delete "processes" from the examples of work organizing structures. Applicants believe that no new matter is being added.

Claim Objections

Claims 1-3, 8-13, 18, 23, 24, 27, and 34 are objected to because of unclear claim language. In response Applicants have amended Claims 1-3, 8-13, 18, 24, 27, and 34 to remove the unclear claim language.

Claim Rejections Under 35 USC § 112, second paragraph

Claims 1-3, 8, 9, 11-13, 18, 23, 24, 27 and 34 are rejected under 35 USC § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention because the claims recite "and/or". In response, Claims 1-3, 8, 9, 11-13, 18, 24, 27 and 34 are amended to remove "and/or".

The Rejection of Claims 1, 14, 24 and 34 Under 35 USC § 101

Claims 1, 14, 24 and 34 are rejected under 35 USC § 101 as being directed to non-statutory subject matter. In response, Applicants have amended Claims 1, 14, 24 and 34 to recite a computer system comprising a processor and a memory. Therefore Applicants respectfully maintain that Claims 1, 14, 24 and 34 are directed to statutory subject matter.

The Rejection of Claims 1-9, and 11 Under 35 USC § 102 (e)

Claims 1-9 and 11 are rejected under 35 USC § 102 (e) as being anticipated by the Owen et al publication (U.S. Published Patent Application Pub. No. 2006/0174132). Claims 1-3, 5, 7-9 and 11 have also been amended to more particularly point out the invention.

The Owen et al publication is directed to a method of integrating a plurality of content repositories into a virtual content repository. The Owen et al publication does not mention a workflow system. Claim 1 is directed to virtually organizing content of a plurality of disparate content repositories, content organizing structures of the plurality of disparate content repositories, work items of a plurality of disparate workflow systems, and work organizing structures of the plurality of disparate workflow systems.

Applicants respectfully maintain that the Owen et al publication does not teach each and every recitation of Claim 1. Applicants maintain that the Owen et al publication does not teach each and every recitation of: **“a virtual repository comprising a plurality of nodes, a first node of the plurality of nodes linking to a work item of a first workflow system of the plurality of workflow systems, a second node of the plurality of nodes linking to a work item of a second workflow system of the plurality of workflow systems, a third node of the plurality of nodes linking to a**

work organizing structure of the first workflow system, a fourth node of the plurality of nodes linking to a work organizing structure of the second workflow system, a fifth node of the plurality of nodes linking to a content of a first content repository of said plurality of disparate content repositories, a sixth node of the plurality of nodes linking to a content of a second content repository of said plurality of disparate content repositories, a seventh node of the plurality of nodes linking to a content organizing structure of the first content repository, and an eighth node of the plurality of nodes linking to a content organizing structure of the second content repository, wherein the API provides access to the virtual repository, wherein the work organizing structure of the first workflow system is one of: a queue and a task list, wherein the work organizing structure of the second workflow system is one of: another queue and another task list, wherein the content organizing structure of the first content repository is a folder, wherein the content organizing structure of the second content repository is another folder.” (emphasis added)

Claims 2-5, 7-9 and 11 depend from Claim 1 and are patentable for the same reasons as Claim 1.

Claim 7

Applicants respectfully maintain that Claim 7 recites additional distinguishing recitations not taught by the Owen et al publication. Applicants maintain that the Owen et al publication does not teach that: the first node is of the type of a link to a workflow system work item, the second node is of the type of the link to the workflow system work item, the third node is of the type of a link to a workflow system work queue, the fourth node is of the type of the link to the workflow system work queue.

Applicants also respectfully maintain that the Owen et al publication also does not teach that the virtual repository comprises an eleventh node being of a type of a

link to a folder populated by a workflow system search, and a twelfth node being of a type of a link to an external resource via a URL.

For the foregoing additional reasons, Claim 7 is not anticipated by the Owen et al publication and is patentable.

Claim 9

Applicants respectfully maintain that Claim 9 recites additional recitations not taught by the Owen et al publication. The rejection asserts that paragraph [0031], line 6 discloses that access is controlled via the SPI. Lines 5-7 teach that Content repositories that implement the SPI (service provider interface) can "plug into" the VCR (virtual content repository). Applicants respectfully maintain that implementing a plug-in framework is different from providing supplemental access control rules in the virtual repository, where the supplemental access control rules are in addition to the access control rules in the content repositories and workflow systems. The SPI interface is a way to make a program extensible.

The Owen et al publication teaches in paragraph [0040], that a PropertyDefiniton can have a name and can describe a corresponding property's data type, whether it is required and whether it is read-only. However, Applicants respectfully maintain that the read-only attribute of the property is not an access control rule of the claimed invention because an access control rule is user-specific. Furthermore, in the claimed invention, the supplemental access control rule is applied to the node and not to a property of a node.

For the foregoing additional reasons, Applicants respectfully maintain that Claim 9 is not anticipated by the Owen et al publication and is patentable.

The Rejection of Claim 10 Under 35 USC § 103 (a)

Claim 10 is rejected under 35 USC § 103(a) as being obvious over the Owen et al publication in view of the Johnson et al publication (U.S. Patent Publication No. 2002/0152210). The Johnson et al publication has Application Serial No. 09/824,694. The Johnson et al application having Application No. 09/824, 694 and the instant application having Application No. 10/825,622 were at the time the invention of application 10/825,622 was made, owned by, or subject to an obligation of assignment to, Venetica Corporation. Applicants have included a Statement of Common Ownership in this amendment. Therefore Applicants respectfully maintain that the Johnson et al publication is disqualified under 35 USC § 103(c) as prior art in a rejection under 35 USC § 103(a).

For the foregoing additional reasons, Applicants respectfully maintain that Claim 10 is not obvious and is patentable.

The Rejection of Claims 12 and 13 Under 35 USC § 103 (a)

Claims 12 and 13 are rejected under 35 USC § 103(a) as being obvious over the Owen et al publication in view of the Michaelides publication (U.S. Patent Application Publication No. 2004/0181753).

As discussed above, the Owen et al publication does not teach all the recitations of Claim 1. Because Claims 12 and 13 depend from Claim 1, the combination of the Owen et al publication and the Michaelides publication does not teach all the recitations of Claims 12 and 13. For the foregoing reasons, Applicants respectfully maintain that Claims 12 and 13 are not obvious.

The Rejection of Claims 14-23

Claims 14-16 and 18-22 are rejected under 35 USC § 102(e) as being anticipated by the Johnson et al publication (U.S. Patent Application Publication No. 2002/0152210).

In response, Applicants amended independent Claim 14 to include the recitations of Claim 23 and to more particularly point out the invention. Claims 17 and 23 are rejected under 35 USC § 103(a) as being obvious over the Johnson et al publication in view of the Ghoneimy et al publication (U.S. Patent Application Publication No. 2004/0078373). Therefore, Applicants respectfully maintain that Claims 14-16 and 18-22 are not anticipated by the Johnson et al publication.

The Applicants respectfully traverse the rejection of Claim 14. The Johnson et al application having Application No. 09/824, 694 and the instant application having Application No. 10/825,622 were at the time the invention of application 10/825,622 was made, owned by, or subject to an obligation of assignment to, Venetica Corporation. Applicants have included a Statement of Common Ownership in this amendment. Therefore Applicants respectfully maintain that the Johnson et al publication is disqualified under 35 USC § 103(c) as prior art in a rejection under 35 USC § 103(a).

In addition, Applicants respectfully maintain that the Ghoneimy et al publication does not teach the recitation of: a universal workflow item attachment function to attach content from any content repository of a plurality of disparate content repositories to any work item of any workflow system of said plurality of disparate workflow systems, and to attach any folder from said any content repository of said plurality of disparate content repositories to said any work item of said plurality of disparate workflow systems.

In paragraph [0041], line 10-12, the Ghoneimy et al publication teaches that the DMS is used to store forms, attachments, and templates. The claimed invention allows content from any content repository to be attached to a work item of any workflow system. The claimed invention also allows any content organizing structure from any content repository to be attached to any work item of a workflow system. The Ghoneimy et al publication does not disclose a universal workflow item attachment function to attach content from any content repository of a plurality of disparate content repositories to a plurality of different work items from different workflow systems of the plurality of disparate workflow systems, and to attach any content organizing structure from said any content repository of said plurality of disparate content repositories to another plurality of different work items from different workflow systems of the plurality of disparate workflow systems.

For the foregoing additional reasons, Applicants respectfully maintain that Claim 14 is not obvious and is patentable. Claims 15-22 depend from Claim 14, and are not obvious for the same reasons as Claim 14.

The Rejection of Claims 24-33

Claims 24-27 are rejected under 35 USC § 102(e) as being anticipated by the Ghoneimy et al publication (U.S. Patent Application Publication No. 2004/0078373).

In response, independent Claim 24 is amended to include the recitations of Claims 28 and 33, and also to more particularly point out the invention. Claims 26 and 27 and 29-32 are also amended to more particularly point out the invention.

Claim 28 is rejected under 35 USC § 103(a) as being obvious over the Ghoneimy et al publication in view of the Brunner et al patent (U.S. Patent No. 5550871). Claim 33 is rejected under 35 USC § 103(a) as being obvious over the Ghoneimy et al

publication in view of the Evans publication (U.S. Published Patent Application 2004/0078340). Therefore, Applicants respectfully maintain that Claims 24-27 are no longer anticipated by the Ghoneimy et al publication.

In Claim 24, the Markush language of Claim 33 is removed. Applicants respectfully maintain that Claim 24 is not obvious over the Ghoneimy et al publication in view of the Evans publication and the Brunner patent.

The Ghoneimy et al publication is directed to a single workflow system. In contrast, the claimed invention is directed to creating rich relationships among multiple workflow systems. Claim 24 recites: a first node of the plurality of nodes linking to a work item of a first workflow system of the plurality of workflow systems, a second node of the plurality of nodes linking to a work item of a second workflow system of the plurality of workflow systems, a third node of the plurality of nodes linking to a work organizing structure of the first workflow system, a fourth node of the plurality of nodes linking to a work organizing structure of the second workflow system.

The Brunner et al patent is directed to a method and system for generating a user interface in a database management system. A semantic data model is used to describe a database in terms of data types stored in the database and functional types that describe relationships between the data types stored in the database.

The Brunner et al patent operates at the database level. In contrast, the claimed invention operates at a level that is higher than the database level. The claimed invention is directed to creating rich relationships between content, content organizing structure, work items and work organizing structures that exist in a plurality of content repositories, a plurality of workflow systems and at least one other external information source.

The rejection of Claim 33 asserts that the Evans publication discloses locator to reference and de-reference entities external to the system. The Applicants respectfully maintain that the Evans publication does not disclose each of the locators as claimed in Claim 24 as follows: locators to reference and de-reference entities external to the system, a first locator to a first external reference, the first locator leverages workflow integration middleware to reference said first work item of said first workflow system; a second locator to a second external reference, the second locator leverages workflow integration middleware to reference said second work item from said second workflow system; a third locator to a third external reference, the third locator leverages workflow integration middleware to reference said work organizing structure of said first workflow system, a fourth locator to a fourth external reference, the fourth locator to reference said work organizing structure of said second workflow system; a fifth locator to a fifth external reference, the fifth locator leverages content integration middleware to reference said content of said first content repository; a sixth locator to a sixth external reference, the sixth locator leverages content integration middleware to reference said content of said second content repository; a seventh locator to a seventh external reference, the seventh locator leverages content integration middleware to reference said content organizing structure of said first content repository; an eighth locator to an eighth external reference, the eighth locator to reference said content organizing structure of said second content repository; and an extensible locator interface to provide a locator to another external system.

Applicants respectfully maintain that the Evans publication is directed to a different problem from the claimed invention. The Evans publication is directed to a system and method for verifying, authenticating, and providing notification of a transaction, such as a commercial or financial transaction, with and/or to at least one party identified as engaging in the transaction and/or identified as having a potential interest in the transaction or type of transaction. In contrast, the claimed invention is directed to creating rich relationships between content, content organizing structure, work

items and work organizing structures that exist in a plurality of content repositories, a plurality of workflow systems and at least one other external information source. Therefore, one skilled in the art would not look to the Evans publication to solve the problem of the claimed invention.

For the foregoing reasons, Applicants respectfully maintain that Claim 24 is not obvious. Claims 25-27 and 29-32 depend, either directly or indirectly, from Claim 24 and are not obvious for the same reasons as Claim 24.

The Rejection of Claims 34-46

Claims 34-46 are rejected under 35 USC § 102(e) as being anticipated by the Zintel et al publication (U.S. Patent Application Publication No. 2002/0029256).

Claim 34 has also been amended to more particularly point out the invention. Applicants have deleted the recitation of "and/or" from Claim 34. Applicants have also deleted the recitations of "other external information sources", the recitation of "content repository searches", "federated content repository searches", "workflow system searches" and "federated workflow system searches" from Claim 34. Claims 35 and 37-46 have also been amended to more particularly point out the invention.

Applicants respectfully maintain that the Zintel et al publication does not teach each and every recitation of Claim 34. Claim 34 recites: A computer system to provide notification of at least one event handler, comprising: a processor; and a memory comprising: an application program interface (API), executable by the processor, to interface with a software application; and a plurality of subscriptions to a plurality of subscribed-to-items, respectively, wherein the API interfaces the software application to the plurality of subscriptions; the subscribed-to-items comprising a first content of a first content repository, a first content organizing structure of the first content

repository, a first work item of a first workflow system, a first work organizing structure of the first workflow system, a second content of a second content repository, a second content organizing structure of the second content repository, a second work item of a second workflow system, a second work organizing structure of the second workflow system; wherein the subscriptions are requests to track when at least one of an addition, change and delete occurs to any of the subscribed-to-items, respectively.

The Zintel et al publication is directed to a universal plug and play (UPnP) device that makes itself known through a set of processes-discovery, description, control, eventing, and presentation. Following discovery of a UPnP device, an entity can learn more about the device's description. The Zintel et al publication is directed to a device connectivity model that supports ad hoc peer networking among computing devices with preferably zero user installation or configuration experience and without persistent device configuration.

Unlike in the Zintel et al publication, the claimed invention is directed to subscriptions to content and content organizing structures of a content management system, and work items and work organizing structures of a workflow system. The claimed invention is not directed to a universal plug and play device. For the foregoing reasons, Applicants respectfully maintain that Claim 34 is not anticipated by the Zintel et al publication.

Claims 35-37 and 46 depend from Claim 34 and are not anticipated by the Zintel et al publication for the same reasons as Claim 34.

Claim 35

Applicants have deleted the recitation of "selected from the group consisting of" from Claim 35. Applicants maintain that the Zintel et al publication also

does not disclose each of the following recitations: wherein each subscription of the plurality of subscriptions is stored with information comprising at least one of: meta-data describing said each subscription, encrypted user credentials to be used when detecting a change of the subscribed-to-item, a latest monitored state representation of the subscribed-to-item in an XML format, and a membership in a logical subscription group.

For the foregoing additional reasons, Applicant respectfully maintain that Claim 35 is not anticipated by the Zintel et al publication.

Claims 38 and 45

Claims 38 and 45 are rejected under 35 USC § 103(a) as being obvious over the Zintel et al publication in view of the Mobley et al patent (U.S. Patent No. 5708963). In response, Applicants have amended Claim 38 and 48 to recite: wherein said event path comprises a timer, a group processor, a content monitor, an event filter and an event handler.

Claims 38 and 45 depend from Claim 34. As discussed above with respect to Claim 34, the Zintel et al publication does not teach all the recitations of Claim 34. Therefore Applicants respectfully maintain that the combination of the Zintel et al publication and the Mobley et al patent does not teach all the recitations of Claims 38 and 45. For the foregoing reasons, Claims 38 and 45 are not obvious.

Applicants respectfully maintain that the Mobley et al patent does not teach an event path that comprises a timer, a group processor, a content monitor, an event filter and an event handler. Therefore, Applicants maintain the combination of the Zintel et al publication and the Mobley et al patent does not teach all the recitations of the Claims 38 and 45.

Furthermore, the Mobley et al patent is directed to an apparatus for using a low earth orbit satellite for reverse path communication in a subscription information service delivery system. The Zintel et al publication is directed to a universal plug and play device. One skilled in the art would not look to the Mobley et al patent and the Zintel et al publication to provide subscriptions to content and content organizing structures in content repositories and to work items and work organizing structures in workflow systems.

For the foregoing reasons, Applicants respectfully maintain that Claims 38 and 45 are not obvious over the combination of the Zintel et al publication and the Mobley et al patent.

Claims 39-44

Claims 39-44 are rejected under 35 USC § 103(a) as being obvious over the Zintel et al publication in view of the Armstrong et al patent (U.S. Patent No. 6279046). Claims 39-44 are amended to more particularly point out the invention.

Claims 39-44 depend directly or indirectly from Claim 34. As discussed above with respect to Claim 34, the Zintel et al publication does not teach all the recitations of Claim 34. Therefore Applicants respectfully maintain that the combination of the Zintel et al publication and the Armstrong et al patent does not teach all the recitations of Claims 39-44. For the foregoing reasons, Claims 39-44 are not obvious.

Furthermore, the Armstrong et al patent is directed to an event-driven communications interface to support communications between multiple logical partitions in a logically-partitioned computer. With logical partitioning, a single physical computer is permitted to operate essentially like multiple and independent "virtual" computers (referred to as logical partitions), with the various resources of the physical computer.

Each logical partition executes a separate operating system. A shared resource, often referred to as a "hypervisor" or partition manager, manages the logical partitions and facilitates the allocation of resources to different logical partitions. Passage of events between logical partitions typically occurs completely through the internal hardware components of the computer, and usually with relatively little overhead, thereby providing performance that is superior to the use of external networks.

Therefore the Armstrong et al patent is directed to a different problem from the claimed invention, and one skilled in the art would not look to the Armstrong et al patent to provide notification of event handlers based on change to content and content organizing structures of content repositories, and to change to work items and work organizing structures of workflow systems.

In addition, the Armstrong et al patent does not disclose the subscriptions of the claimed invention. The Armstrong et al patent is directed to event-driven communication within a single physical computer system. The Armstrong et al patent teaches events between logical partitions in a single computer system. The Armstrong et al patent does not teach events based on content and content organizing structures of content repositories and work items and work organizing structures of workflow systems. The Armstrong et al patent does not teach events based on changes in content repositories and workflow systems.

Furthermore the Armstrong et al patent does not teach a filter that filters interesting and uninteresting changes in events based on changes in content repositories and workflow system.

The Armstrong et al patent does not teach: an event path defined per a logical group comprising a timer, a subscription group processor that creates events based on the subscriptions in response to the timer, a content monitor that detects change based

on the events, an event filter that filters uninteresting change and interesting change, and an event handler that receives the interesting change.

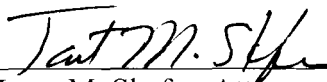
For the foregoing reasons, Applicants respectfully maintain that Claim 39 is not obvious over the Zintel et al publication in view of the Armstrong et al patent. Claims 40 to 43 depend from Claim 39 and are not obvious for the same reasons as Claim 39.

Conclusion

Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

Respectfully submitted,

March 21, 2007



Janet M. Skafar, Attorney
Reg. No. 41,315
Correspondence Customer No. 24852
Telephone: (650)988-0655
Facsimile: (408) 463-4827